

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
at CHATTANOOGA

IN THE MATTER OF THE SEARCH OF:  
USPS Mail Parcel identified  
by tracking # 9505 5131 7959 9010 2623 40  
addressed to:  
LACEE HUNTER  
234 PIKE ST APT 406  
ATHENS, TN 37303

Case No.: 1:19-mj-6

**AFFIDAVIT**

I, Jedidiah Hutchison, being duly sworn, hereby depose and say:

1. I am a Postal Inspector with the United States Postal Inspection Service. I have been employed in this capacity since 2010. I am currently assigned to the United States Postal Inspection Service Office in Chattanooga, Tennessee. I am responsible for investigating crimes involving the United States Postal Service ("USPS"), its employees, and its customers. These crimes include but are not limited to employee assaults, mail fraud, mail theft, identity theft, and prohibited mailings including child pornography and illegal narcotics.
2. I am a Law Enforcement Officer under the authority of Title 18, United States Code, Section 3061. As such, I am authorized to make arrests with or without warrants for offenses made in my presence or when I have reasonable grounds to believe the person has committed or is committing a felony against the United States. I am also authorized under this statute to carry firearms and make seizures of property as provided by law.
3. From my training and experience, I know that the United States Postal Service is frequently used to transport illegal narcotics to areas throughout the United States. I am also aware that the United States Postal Service is used to send the proceeds relating to narcotics distribution back to the narcotics source of supply. I also know that the reason drug traffickers use the United

States Mail to ship controlled substances and their proceeds is because of the speed and protection afforded the United States Mail.

4. Title 21, United States Code, Section 841 makes it an offense for any person to manufacture, distribute, or possess with intent to manufacture or distribute, a controlled substance. Title 21, United States Code, Section 843(b) makes it an offense for any person knowingly or intentionally to use any communication facility in committing or in causing to facilitate the commission of any act or acts constituting a felony under any provisions of Subchapter I or Subchapter II of the Drug Abuse Prevention and Control Act. Title 21, United States Code, Section 846 makes it an offense to conspire to commit an offense set out in Title 21. Under Title 18 United States Code, Section 1342 makes it illegal to receive mail matter or packages addressed to fictitious names while carrying on unlawful business.

5. To combat the distribution of illegal narcotics and their proceeds, certain investigative techniques are utilized by Postal Inspectors. What follows is not meant to set forth all exhaustive investigative knowledge of this case or investigative techniques used, but only those facts necessary in order to establish probable cause.

#### **RELEVANT FACTS**

6. On January 14, 2019 Postal Inspection Service (USPIS) removed a US Mail package from the Athens, TN Post Office addressed as follows:

FROM:

JACOB PONCE  
9324 LOS ANGELES ST  
BELLFLOWER, CA 90706

TO:

LACEE HUNTER  
234 PIKE ST APT 406  
ATHENS, TN 37303

6. The package is coming from a known source area of narcotics in California.
7. I have examined USPS records for packages delivered to the target address of 234 Pike St Apt 406, in Athens TN. I noticed a pattern of deliveries consistent with narcotics trafficking. Out of twelve known parcels sent to this address during the past year, seven of them have been from the same area of California.
8. The packages are sent at regular intervals from this area of California, that is, they have been sent on 9/10/2018, 10/9/2018, 10/30/2018, 11/8/2018, 11/29/2018, 12/6/2018, and 1/10/2019. It is common practice for narcotics traffickers to receive shipments in regular intervals from their narcotics source of supply.
9. Out of the seven known packages, sender names listed include "Juan Ponce", "John Ponce", "David Ponce", and "Jacob Ponce" with the return address of either 9324 Los Angeles St, or 9515 Rosecrans Ave in Bellflower, CA 90706. All of the packages have similar-looking handwriting. It is common practice for narcotics traffickers to use fictitious and/or multiple sender names in order to conceal the true identity of the narcotics source.
10. I researched the return address of 9324 Los Angeles St in Bellflower, CA and discovered that although Juan and John Ponce are both associated this address based on Law Enforcement database I have viewed video surveillance of the sender who resembles a different individual known to law enforcement who resides close to the return address. Although it used to be quite common for narcotics traffickers to use fictitious return addresses, it has become more common for them to use known addresses of associates without their knowledge.
11. On January 15, 2019, I met with K-9 Drug Detector Dog Unit Officer Timmons and his K-9 "Burt". K-9 Burt conducted exterior examinations of the above parcel along with three (3) other parcels of similar appearance. I was present when the parcels were presented to K-



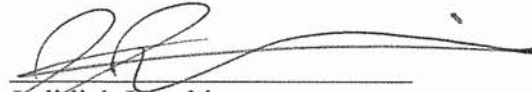
9 Burt by his handler, Officer Timmons. Officer Timmons informed me that K-9 Burt demonstrated a positive alert and indication on the package bearing the above address (i.e., the target package that is the object of this search warrant application).

12. I have been advised of the qualifications of the K-9 handler and his narcotics detector canine. K-9 Burt is trained to detect the odor of illegal narcotics including but not limited to marijuana, cocaine, heroin, ecstasy and methamphetamine. K-9 Burt and Officer Timmons are certified by the United States Police Canine Association and employed by the Chattanooga Police Department. For approximately 1.5 years, K-9 Burt and Officer Timmons have completed training including K-9 drug detection techniques, handling and handler-dog communication and have had no alerts on vehicles that were not justified by narcotics either inside the vehicle or admittance of recent narcotics activity inside the vehicle. .

13. Based on the facts set forth in this affidavit, I believe there is probable cause to believe that the above mentioned parcel contains controlled substances, currency, paraphernalia, or other evidence that relates to trafficking of controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance) and 843(b) (unlawful use of a communication facility, including the U.S. Mails, to facilitate the distribution of a controlled substance).

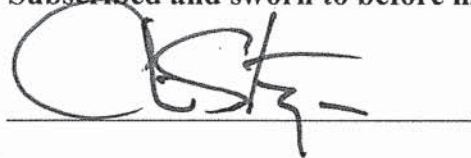
14. The subject parcel has been maintained unopened in my custody pending application for a search warrant.

FURTHER AFFIANT SAYETH NOT.



Jedidiah Hutchison  
Postal Inspector  
United States Postal Inspection Service

Subscribed and sworn to before me this 15th day of January, 2019



UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
at CHATTANOOGA

IN THE MATTER OF THE SEARCH OF:

USPS Mail Parcel identified

by tracking # 9505 5131 7959 9010 2623 40

addressed to:

LACEE HUNTER

234 PIKE ST APT 406

ATHENS, TN 37303

Case No.: 1:19-mj-6

**ATTACHMENT A**

DESCRIPTION OF THE PROPERTY TO BE SEARCHED

USPS Mail Parcel identified by tracking # 9505 5131 7959 9010 2623 40 addressed to:

LACEE HUNTER 234 PIKE ST APT 406, ATHENS, TN 37303

that is now in the custody of the United States Postal Inspection Service in Chattanooga, Tennessee.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
at CHATTANOOGA

IN THE MATTER OF THE SEARCH OF:

USPS Mail Parcel identified

by tracking # 9505 5131 7959 9010 2623 40  
addressed to:

LACEE HUNTER

234 PIKE ST APT 406

ATHENS, TN 37303

Case No.: 1:19-mj-6

**ATTACHMENT B**

LIST OF ITEMS AUTHORIZED TO BE SEARCHED FOR AND SEIZED PURSUANT TO  
SEARCH WARRANT

1. One US Mail Parcel described above;
2. Books, photographs, records, receipts, notes, ledgers and other papers which show the transportation, ordering, purchase, distribution, possession, sale or manufacture of controlled substances;
3. Address and/or telephone books and papers reflecting names, addresses, and/or telephone numbers, written or typed by hand as opposed to printed commercially;
4. Letters, records, computerized and electronic records, receipts, bank statements and records, money drafts, letters of credit, wire transfers, safe deposit box keys, money order and cashier's check receipts, passbooks, bank checks, and other items that reflect the expenditure, obtaining, secreting, transfer or concealment of drug proceeds;
5. United States currency, precious metals, jewelry, and financial instruments, including, but not limited to, stocks and bonds, notes and other documents showing an accumulation of assets, wealth, or money to the extent that these items are found in such quantity, substance and/or quality as to permit a reasonable inference that such items are proceeds of drug trafficking;

6. Controlled substances, material and paraphernalia for manufacturing, packaging, cutting, weighing, and distributing controlled substances, but not limited to scales, baggies, and packing material;
7. Indicia of occupancy, residency, and/or ownership of the premises described above and other real property, including but not limited to deeds, utility and telephone bills, canceled envelopes, and keys;
8. Papers, tickets, notes schedules, receipts and other documents relating to travel to and from drug source areas and drug distribution areas;
9. Any and all other material evidence of violations of 21 U.S.C. §§ 841, 843, and 846, which include attempt and possession with intent to distribute and distribution of controlled substances and importation of a controlled substance from a foreign country.